

**Morris, Andrew J.**

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**From:** Morris, Andrew J.  
**Sent:** Thursday, February 8, 2024 5:47 PM  
**To:** tmm@fylaw.com; pdugas@dcclawfirm.com  
**Cc:** Howell, Peyton  
**Subject:** RE: Mullican v. State Farm

Preston and Terry – Per my phone call with Preston and my email with Terry earlier this week, these subpoenas are just to (i) formalize that already-agreed-to deposition date for Ian's and (ii) set something on everybody's calendar for Valor because of the 14-day requirement via local rule. I'll certainly work with Valor and with you all to reset the Valor deposition date if needed so long as it doesn't cause a problem compared to the dispositive motion deadline. Also, if Valor will agree to do the deposition in Oklahoma City instead of Tulsa, please let us know and we can do it here instead. As will be clear from what's below, it seems like any scheduling discussions with Valor will have to be through you all, not through us.

As to documents from Valor, we issued a subpoena duces tecum to them a few months ago but never received anything in response. Peyton reached out to them by phone this week to follow up and was told that they'd produced all responsive documents to Foshee & Yaffe previously. And they strongly indicated they'd only talk with you, not with us. Can you please send us whatever Valor produced to you pursuant to the subpoena duces tecum we issued to them? Or, if you've already produced the responsive documents from our subpoena to Valor as part of the overall document production from Plaintiffs, will you please let us know what ranges the documents are in so we can prepare for the deposition accordingly? I'd like to avoid having to file a motion to compel as to Valor; that doesn't seem necessary. We just need some clarity that we have all responsive documents and where they are.

Thanks,

AJM



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**From:** Lewis, Sandy <sandy.lewis@mcafeetaft.com>  
**Sent:** Thursday, February 8, 2024 4:41 PM  
**To:** tmm@fylaw.com; pdugas@dcclawfirm.com; amanda@blackwoodlawfirm.com

**Cc:** Morris, Andrew J. <andrew.morris@mcafeetaft.com>; Howell, Peyton <peyton.howell@mcafeetaft.com>

**Subject:** Mullican v. State Farm

Attached please find the following:

1. Subpoena to Testify at a Deposition in a Civil Action to Ian's Enterprise, LLC; and
2. Subpoena to Testify at a Deposition in a Civil Action to Valor Forensic Engineering Services.

You will also receive a copy via U.S. Mail.

Thank you,  
Sandy Lewis



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